

MEMO ENDORSED

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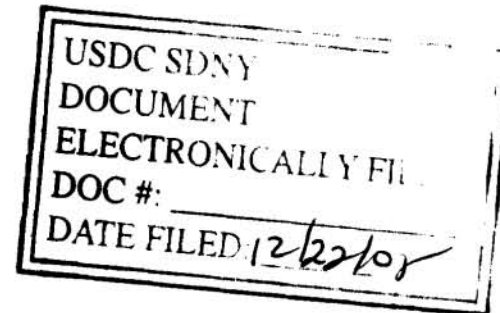
TALLAHASSEE, FL

WASHINGTON, DC

December 19, 2005

VIA FACSIMILE

Honorable Kenneth M. Karas, U.S.D.J.
Daniel J. Patrick Moynihan United States Courthouse
500 Pearl Street, Room 920
New York, New York 10007-1312



Re: Frontier Insurance Co. v. Dwight Halvorson Insurance Services, Inc., et al.,
04 Civ. 3361 (KMK)

Dear Judge Karas:

We represent plaintiff Gregory V. Serio, Superintendent of Insurance of the State of New York, as both the Rehabilitator of Frontier Insurance Company and Assignee of Platinum Indemnity, Ltd., in the above-referenced matter. We write to respectfully request that our time to file reply papers in support of our partial summary judgment motion be extended one week from December 23, 2005 to December 30, 2005. On December 2, 2005, the Court modified the initial briefing schedule so as to allow defendant additional time to file its opposition papers. When we consented to that modification, we were not aware that the holiday travel schedule of one of our key witnesses would complicate our ability to submit reply papers by the end of this week. Defense counsel has consented to our request.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "William S. Gyves".

William S. Gyves (WG 2770)

WSG/ed

Plaintiff is given until December 30, 2005

cc: Lorienton N.A. Palmer, Esq. (via facsimile) to file his Reply memorandum.

SO ORDERED

A handwritten signature in dark ink, appearing to read "Kenneth M. Karas".
KENNETH M. KARAS U.S.D.J.

12/20/05